

# EXHIBIT D

**From:** [Kevin A. Fritz](#)  
**To:** [Bender, Kristin](#); [Roeser, Stephanie](#); [Theresa Troupson](#); [Chip Babcock](#); [Joel Glover](#); [Bryan Freedman](#); [Miles Cooley](#); [Jason Sunshine](#); [Mitch Schuster](#); [Stacey Ashby](#); [Amit Shertzer](#); [mitra@ahouraianlaw.com](#); [Christina Puello](#); [Cortni Davis](#); [Vaneta Birtha](#); [Jose Perez](#); [Ellyn Garofalo](#); [Summer Benson](#)  
**Cc:** [Gottlieb, Michael](#); [Governski, Meryl Conant](#); [Nathan, Aaron E.](#); [Bruno, Matthew](#); [Connolly, Michaela](#); [Hudson, Esra](#); [Climaco, Katelyn](#); [Taustine, Melissa](#)  
**Bcc:** [13133\\_1 Wayfarer Studios LLC et al](#) [Blake Lively](#) [Emails](#)  
**Subject:** RE: Lively v. Wayfarer  
**Date:** Thursday, June 12, 2025 8:43:16 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

Kristin, thank you for your email. Please let me know if all documents responsive to the categories specified below will be in tomorrow's production.

**MSF**  
 Meister Seelig & Fein PLLC

**Kevin A. Fritz**  
 Partner

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**From:** Bender, Kristin <KBender@willkie.com>

**Sent:** Thursday, June 12, 2025 8:40 PM

**To:** Kevin A. Fritz <kaf@msf-law.com>; Roeser, Stephanie <SRoeser@manatt.com>; Theresa Troupson <ttroupson@lftcllp.com>; Chip Babcock <cbabcock@jw.com>; Joel Glover <jglover@jw.com>; Bryan Freedman <bfreedman@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Mitch Schuster <ms@msf-law.com>; Stacey Ashby <sma@msf-law.com>; Amit Shertzer <as@msf-law.com>; mitra@ahouraianlaw.com; Christina Puello <cpuello@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Ellyn Garofalo <egarofalo@lftcllp.com>; Summer Benson <sbenson@lftcllp.com>

**Cc:** Gottlieb, Michael <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Bruno, Matthew <MBruno@manatt.com>; Connolly, Michaela <MConnolly@willkie.com>; Hudson, Esra <EHudson@manatt.com>; Climaco, Katelyn <KClimaco@manatt.com>; Taustine, Melissa <MTaustine@willkie.com>

**Subject:** RE: Lively v. Wayfarer

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Hi Kevin,

We are available at the time you propose. We will send an invite.

As to your position below, the Wayfarer Parties have already received multiple productions from Sony and WME, and

the Wayfarer Parties and Ms. Lively mutually are engaged in making rolling productions in advance of the substantial completion deadline. This is the first time that you have raised a concern with the pace of Ms. Lively's productions, and the Wayfarer Parties have only made two voluntarily productions, or three including the compelled production. Ms. Lively has also produced 2,832 documents, and all of the Wayfarer Parties collectively have produced only 754 documents (including those that were compelled). In any event, Ms. Lively intends to make her next production tomorrow (6/13), and to make regular rolling productions thereafter that will satisfy substantial completion obligations by July 1. All this said, we will be ready to discuss the parties' productions, as needed.

All rights reserved, including with respect to the positions stated below. Finally, as an administrative matter, please keep Melissa Taustine copied on counsel correspondence.

Thanks,  
Kristin

**Kristin Bender**  
**Willkie Farr & Gallagher LLP**  
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Direct: [+1 202 303 1245](tel:+12023031245) | Mobile: [+1 703 732 4995](tel:+17037324995)  
[kbender@willkie.com](mailto:kbender@willkie.com) | <vCard> | [www.willkie.com bio](http://www.willkie.com/bio)

**From:** Kevin A. Fritz <[kaf@msf-law.com](mailto:kaf@msf-law.com)>

**Sent:** Thursday, June 12, 2025 4:51 PM

**To:** Roeser, Stephanie <[SRoeser@manatt.com](mailto:SRoeser@manatt.com)>; Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[jglover@jw.com](mailto:jglover@jw.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>; Mitch Schuster <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; [mitra@ahouraianlaw.com](mailto:mitra@ahouraianlaw.com); Christina Puella <[cpuella@lftcllp.com](mailto:cpuella@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>  
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**Subject:** RE: Lively v. Wayfarer

\*\*\* EXTERNAL EMAIL \*\*\*

Counselors:

We are available to meet/confer at noon PST / 3pm EST on Friday about Michaela Connolly's email concerning our document production and about Esra Hudson's letter concerning Blake Lively's June 23, 2025 deposition. For the sake of expediency, please also be prepared to discuss Lively's woefully deficient document production. Even though we served our First Set of Request for Production months ago, and even though ten weeks ago Lively assured us via her formal responses and objections thereto that she would conduct a reasonable search for and produce relevant, non-privileged documents, she has produced nothing other than documents she "obtained" from her company Vanzan, Inc. As merely a few examples, Lively has not produced: Documents and communications relating to her allegations of sexual harassment and/or other misconduct relating to the Film (Doc. Req. No. 3);

1. Documents and communications relating to and/or reflecting her communications with Sony relating to sexual harassment and/or other misconduct relating to the Film (Doc. Req. No. 48);
2. Documents and communications relating to and/or reflecting her communications with WME relating to sexual harassment and/or other misconduct relating to the Film (Doc. Req. No. 51);
3. Documents and communications relating to her claims for damages (such as those supporting her allegation, in paragraph 457 of her Amended Complaint, that she "has suffered and continues to suffer

substantial damages, including, but not limited to, past and future losses in earnings, equity, and other employment benefits and has incurred other economic losses...”);

4. Documents and communications with Taylor Swift who, according to Lively’s Amended Initial Disclosures, has knowledge of “The parties’ alleged conduct; complaints or discussions about the work environment or conduct on the set of the Film; the production, editing, cut, and creative process associated with the Film; publicity surrounding the Film; the retaliation campaign alleged by Ms. Lively and resulting damages suffered.”

Given that such documents and communications are material and relevant to the crux of Lively’s claims, and given that more than two months have passed since Lively assured us that such documents would be produced, we intent to promptly raise this issue with the Court unless a mutually agreeable resolution is reached.

**MSF**

Meister Seelig & Fein PLLC

**Kevin A. Fritz**

Partner

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**From:** Roeser, Stephanie <[SRoeser@manatt.com](mailto:SRoeser@manatt.com)>

**Sent:** Wednesday, June 11, 2025 11:59 PM

**To:** Theresa Troupson <[ttroupson@lftcllp.com](mailto:ttroupson@lftcllp.com)>; Kevin A. Fritz <[kaf@msf-law.com](mailto:kaf@msf-law.com)>; Chip Babcock <[cbabcock@jw.com](mailto:cbabcock@jw.com)>; Joel Glover <[jglover@jw.com](mailto:jglover@jw.com)>; Bryan Freedman <[bfreedman@lftcllp.com](mailto:bfreedman@lftcllp.com)>; Miles Cooley <[mcooley@lftcllp.com](mailto:mcooley@lftcllp.com)>; Jason Sunshine <[j sunshine@lftcllp.com](mailto:j sunshine@lftcllp.com)>; Mitch Schuster <[ms@msf-law.com](mailto:ms@msf-law.com)>; Stacey Ashby <[sma@msf-law.com](mailto:sma@msf-law.com)>; Amit Shertzer <[as@msf-law.com](mailto:as@msf-law.com)>; mitra@ahouraianlaw.com; Christina Puello <[cpuello@lftcllp.com](mailto:cpuello@lftcllp.com)>; Cortni Davis <[cdavis@lftcllp.com](mailto:cdavis@lftcllp.com)>; Vaneta Birtha <[vbirtha@lftcllp.com](mailto:vbirtha@lftcllp.com)>; Jose Perez <[jperez@lftcllp.com](mailto:jperez@lftcllp.com)>; Ellyn Garofalo <[egarofalo@lftcllp.com](mailto:egarofalo@lftcllp.com)>; Summer Benson <[sbenson@lftcllp.com](mailto:sbenson@lftcllp.com)>

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**Subject:** Lively v. Wayfarer

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Counsel,

Please see attached correspondence.

Thanks,  
Stephanie

**Stephanie Roeser**  
Partner

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